



**Subject:** Comments on Draft 2006-2008 STIP

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Department of Environmental Conservation, Air Quality Division staff reviewed the draft 2006-2008 Statewide Transportation Improvement Program (STIP) and provides the following comments for your consideration. As you are aware, the close coordination of transportation projects and air quality plans is important to meeting transportation and environmental goals.

The success of this coordination can be found in Anchorage, Fairbanks, and Juneau. The partnership between transportation and air quality efforts has allowed the communities to accommodate growth, meet their transportation needs and attain the health based standards for carbon monoxide and particulates. For these communities, it is important to continue our collective efforts to ensure that they are able to meet the needs of community growth and health based standards well into the future. At the same time, we must expand our efforts to include rural communities where particulate concentrations have been found that exceed the current health based standards.

After careful review of the draft 2006-2008 STIP, I would like to submit the following comments:

1. Two Congestion Mitigation & Air Quality (CMAQ) projects submitted by the department in 2003 do not appear in the statewide CMAQ allocation.

The first project is the statewide PR project that was submitted by the department in a memo from Commissioner Ballard to Commissioner Barton on September 19, 2003. Public education targeted to air pollution is critical to altering the behaviors that create mobile source emissions. For FY06, the amount needed is \$110,000 (plus the amount necessary to cover the DOT-ICP allocation). Project funding for FY07 and FY08 should be continued at this same rate.

The second project is the Enhanced Motorist Compliance program that was submitted in the same memo as the PR project above. This project was funded from the statewide CMAQ funds for FY04-FY06. Initially the department requested all of the funds to be awarded in FY04. However, due to limited appropriations, the funds were spread over each fiscal year. FY06 will be the last year of funding for the project that includes efforts in Fairbanks and Mat-Su valley. The total funds requested for FY06 is \$300,000 (plus the amount necessary to cover the DOT-ICP allocation). This is a committed control measure in the Fairbanks CO Maintenance Plan and State Implementation Plan for Fairbanks and the Mat-Su commuters.

2. The allocation for the statewide CMAQ projects within the Yukon-Koyukuk district and Various Boroughs need some clarification. The total amount of funding that has been brought back to headquarters from AMATS and FMATS totals \$5,500,000. However, the total amount reflected on the two pages referenced is less than the amounts reflected for both MPOs for FY06.

In addition, recent developments related to potential rural non-attainment areas results in two



scenarios to clarify these funds. Approximately two weeks ago, senior management of ADEC met with the Regional Administrator for EPA Region 10 and his senior management team. At this meeting, EPA is explained they would not be taking any action to designate any new non-attainment areas until they have completed their review and adoption of new health standards for particulates. Final action on the new standards is not expected until late September 2006. Depending upon the approach taken to adopt the new standards and the form of the standard, the earliest possible designation of a new non-attainment area would be late 2007.

The first option would be to continue to hold the funds in a statewide account and make it clear that the funds are mandatory funds that can only be used in existing non-attainment areas (Eagle River and Juneau for PM<sub>10</sub>) and maintenance areas (Anchorage and Fairbanks for CO). Each non-attainment or maintenance area could submit requests for CMAQ projects. Projects would be funded utilizing existing statewide evaluation criteria.

The second option would be to continue the past practice of allocating dedicated CMAQ funds to Anchorage and Fairbanks, while continuing to retain some funds in a statewide account. The statewide account would ensure that funds would go to projects that provide the greatest benefits and enable Juneau to compete for some funds as needed. This approach would necessitate language that future allocations would be subject to change should a new area be designated as non-attainment area.

3. In the table titled, "Fiscal Summary Draft 2006-2008 STIP," it is unclear why there is a negative amount (-6,411.0) for 2008 for the available funds in the CMAQ category even though programmed funds are included for that category later in the table.

4. In the introductory section on Surface Transportation Funding Sources, page 23, last paragraph, second line: "...to reduce traffic congestion and/or improve air quality in federally designated non-attainment areas....". This sentence should be modified to include "maintenance" areas as well as non-attainment areas as they are also eligible for dedicated CMAQ funding.

We appreciate your consideration of these comments. If you have any questions or require further clarification, please do not hesitate to contact me.

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